

JAP:DCW

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

M10-1153

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a)
and 960)

CHARMAINE CARLOTTA BROWN,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

MARK STURTEVANT, being duly sworn, deposes and states that he is a Special Agent of the United States Department of Homeland Security, Immigration and Customs Enforcement, duly appointed according to law and acting as such.

Upon information and belief, on or about October 5, 2010, within the Eastern District of New York and elsewhere, the defendant CHARMAINE CARLOTTA BROWN did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:¹

^{1/} Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am

1. On or about October 5, 2010, the defendant CHARMAINE CARLOTTA BROWN arrived at John F. Kennedy International Airport ("JFK") in Queens, New York, aboard Air Jamaica Flight No. 11 from Montego Bay, Jamaica.

2. During a routine inspection, BROWN presented two suitcases to Customs and Border Protection ("CBP") officers, including a taupe "Palm Springs" suitcase (the Palm Springs suitcase). BROWN told CBP officers that the suitcases and everything in the suitcases belonged to her.

3. Inside the Palm Springs suitcase, CBP officers discovered a black leather portfolio. CBP Officers noted that the portfolio was unusually heavy. When CPB officers probed the portfolio, they discovered that it contained a white powder substance.

4. BROWN was escorted to a private search area where the white powder substance found in the black leather portfolio was field tested. The field test was positive for cocaine. As a result, BROWN was arrested.

5. BROWN was given Miranda warnings which she appeared to understand and waived. BROWN then stated in sum and substance that she had agreed to carry the portfolio into the United States for another person, and that she knew that the portfolio had been placed inside her suitcase before she departed Jamaica for the

aware.

United States. She also said that she knew that the portfolio inside her suitcase probably contained drugs. Brown stated that she was going to be paid \$4,000 for carrying the bag into the United States.

6. The total approximate gross weight of the cocaine found in the black leather portfolio inside Brown's Palm Springs suitcase is 1,247.6 grams.

WHEREFORE, your deponent respectfully requests that the defendant CHARMAINE CARLOTTA BROWN be dealt with according to law.



MARK STURTEVANT
Special Agent
U.S. Department of Homeland Security
Immigration and Customs Enforcement

Sworn to before me this
6th day of October, 2010

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